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December 20, 2023

VIA ECF

Hon. Arun Subramanian
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St. Courtroom 15A
New York, NY 10007-1312

Re: Flynn et al, v. Cable News Network, Inc., No. 1:21-cv-02587-AS-SLC
Letter-Motion to File Confidential and Highly Confidential Materials Under Seal

Dear Judge Subramanian,

I represent Plaintiffs Jack and Leslie Flynn in the above captioned matter. Pursuant to Fed. R. Civ. P. 5.2(e) and 26(c), and the Court's Individual Practice Rule 11B, I respectfully request to file portions of Plaintiffs' Memorandum in Opposition to Defendants' Motion for Summary Judgment under seal, given that this Memorandum cites to exhibits and deposition testimony designated "confidential" or "highly confidential" by Defendants pursuant to the Parties' Confidentiality Stipulation and Protective Order (ECF No. 60).

Pursuant to the Court's Individual Practice Rule 11Ci, counsel for the Parties conferred, and Defendants consent to this motion.

Dated: December 20, 2023

Respectfully submitted,

/s/ Jared Roberts

Jared J. Roberts, *pro hac vice*
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